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Attorneys for Debtors and Reorganized Debtors

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

PACIFIC GAS AND ELECTRIC COMPANY.

Debtors.

- Affects PG&E Corporation
- Affects Pacific Gas and Electric Company
- Affects both Debtors

** All papers shall be filed in the Lead Case, No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**REORGANIZED DEBTORS' REVISED¹
REPORT ON RESPONSES TO ONE
HUNDRED TWENTIETH OMNIBUS
OBJECTION TO CLAIMS AND REQUEST
FOR ORDER BY DEFAULT AS TO
UNOPPOSED OBJECTIONS**

[Re: Dkt. Nos. 13670, 13698, 13719,
13730, 13753]

**Regarding Objections Set for Hearing
May 24, 2023, at 10:00 a.m. (Pacific Time)**

¹ This Report revises Docket No. 13738 to reflect that Jackson Rancheria Development Corp. filed a response to the Omnibus Objection (as defined below).

REQUEST FOR ENTRY OF ORDER BY DEFAULT

PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as debtors and reorganized debtors (collectively, the “**Debtors**” or the “**Reorganized Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”) hereby request, pursuant to Rule 9014-1(b)(4) of the Bankruptcy Local Rules for the United States District Court for the Northern District of California, as made applicable to these Chapter 11 Cases by the *Second Amended Order Implementing Certain Notice and Case Management Procedures*, entered on May 14, 2019 [Dkt No. 1996] (“**Case Management Order**”), that the Court enter an order by default on the *Reorganized Debtors’ One Hundred Twentieth Omnibus Objection to Claims (No Liability Claims)* [Docket No. 13670] (the “**Omnibus Objection**”).

RELIEF REQUESTED IN THE OMNIBUS OBJECTION

The Omnibus Objection seeks to disallow and expunge the Proofs of Claim listed in Exhibit 1 to the Omnibus Objection.

NOTICE AND SERVICE

The Reorganized Debtors filed a Notice of Hearing with respect to the Omnibus Objection [Docket No. 13672]. The Omnibus Objection was also supported by the declaration of Renee Records [Docket No. 13671]. The Omnibus Objection, the Notice of Hearing, and the Declaration were served as described in the *Certificate of Service of Alain B. Francoeur*, filed on April 20, 2023 [Docket No. 13677]: each holder of a Claim listed on Exhibit 1 to the Omnibus Objection received a notice customized to include the claim number, debtor, claim amount and priority, and the basis for Reorganized Debtors' objection with respect to the applicable Claim to be disallowed and expunged.

The deadline to file responses or oppositions to the Omnibus Objection has passed. The Reorganized Debtors have received the following responses:

Docket No.	Claimant	Claim No.	Resolution
13698	Quentin Keen	67135	The Reorganized Debtors have reached a settlement with Claimant. The hearing on the Omnibus Objection will be taken off calendar pending documentation of the settlement.

Docket No.	Claimant	Claim No.	Resolution
13719	Synergy Project Management, Inc.	72390	The Reorganized Debtors are investigating Claimant's response to the Omnibus Objection. The Reorganized Debtors have attempted to contact Claimant but have not received a response to date. Accordingly, the hearing on the Omnibus Objection with respect to this Claim will be continued to July 26, 2023.
13730	David Mitchell	2306	The Reorganized Debtors are investigating Claimant's response to the Omnibus Objection. Mr. Mitchell has agreed to continue the hearing on the Omnibus Objection with respect to this Claim to July 26, 2023.
13753	Jackson Rancheria Development Corp.	3002	The Reorganized Debtors are investigating Claimant's response to the Omnibus Objection. Jackson Rancheria has agreed to continue the hearing on the Omnibus Objection with respect to this Claim to July 26, 2023.

DECLARATION OF NO OPPOSITION RECEIVED

The undersigned hereby declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury that:

1. I am an attorney with the law firm of Keller Benvenutti Kim LLP, co-counsel for the
Reorganized Debtors.

2. I have reviewed the Court's docket in the Chapter 11 Cases and have determined that no
responses have been filed with respect to the Omnibus Objection except as described herein.

3. This declaration was executed in San Francisco, California.

WHEREFORE, the Reorganized Debtors hereby request entry of an Order disallowing and
expunging the Proofs of Claim listed in Exhibit 1 to this Request, which listed Claims are identical to
those listed in Exhibit 1 to the Omnibus Objection, except as otherwise discussed above.

1 Dated: May 22, 2023

2 **KELLER BENVENUTTI KIM LLP**

3 By: /s/ Dara L. Silveira
4 Dara L. Silveira

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Attorneys for Debtors and Reorganized Debtors

Exhibit 1

Original Creditor	Claim Transferred To:	Claim/Schedule To Be Disallowed and Expunged	Debtor	Date Filed/Scheduled:	Secured	Administrative	Priority	Unsecured	Total	Basis for Objection
Sierra Corporation (dba Chemistry Corporation)		813	PG&E Corporation and Pacific Gas and Electric Company	2/15/2019	\$0.00	\$0.00	\$20,000.00	\$20,000.00	\$20,000.00	Rule 2; No Liability Based on Investigation
Chemistry Corporation 11500 San Ram Road (Corner of Dolan Rd & Highway 1) Moss Landing, CA 95039										
Siemens-Padgett, Manuel Cord Barr & Mudford LLP Este Lewis 153858 1824 Court Street PO Box 994390 Redding, CA 96001		59027	PG&E Corporation and Pacific Gas and Electric Company	10/17/2019	\$0.00	\$0.00	\$392,979.48	\$392,979.48	\$392,979.48	Amended and Superseded
Siemeriz, Hedger P.O. Box 1392 San Juan Bautista, CA 95045		8599	PG&E Corporation and Pacific Gas and Electric Company	9/9/2019	\$50,000.00	\$0.00	\$15,700.00	\$134,300.00	\$200,000.00	No Liability Based on Investigation
Siemeriz, Hedger P.O. Box 1392 San Juan Bautista, CA 95045		2676	PG&E Corporation and Pacific Gas and Electric Company	4/23/2019	\$150,000.00	\$0.00	\$50,000.00	\$0.00	\$200,000.00	No Liability Based on Investigation
Siemeriz, Hedger P.O. Box 1392 San Juan Bautista, CA 95045		4012	PG&E Corporation and Pacific Gas and Electric Company	7/23/2019	\$0.00	\$0.00	\$360,000.00	\$360,000.00	\$360,000.00	Barred by Statute of Limitations;
Siemeriz, Linda 2777 Betters Rd Madera, CA 93636		1951	PG&E Corporation and Pacific Gas and Electric Company	4/1/2019	\$0.00	\$0.00	\$360,000.00	\$360,000.00	\$360,000.00	No Liability Based on Investigation
Siemeriz, Linda 2777 Betters Rd Madera, CA 93636										
Claims To Be Expunged Totals		Count: 6			\$200,000.00	\$0.00	\$65,700.00	\$1,267,279.48	\$1,532,979.48	

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